

DECLARATION OF TRAVIS GOODREAU

I, Travis Goodreau, declare as follows:

1. I am a former police officer with the Glendale Police Department (“Department”) and was employed from 2005 until my retirement in 2019. As part of my training as a police officer, I received regular training regarding probable cause and the processes to be followed for search and seizure. I have personal knowledge of all matters stated in this declaration and if called to testify, I could and would competently do so.

2. On December 20, 2017, the Department was contacted by Edward Rivas, the manager at Extra Space Storage, to report a theft. Mr. Rivas reported that as he was conducting a walkthrough at the facility, he discovered a cut lock to storage unit # B-160, which belonged to an individual named Cheryl Canter.

3. As part of the Department’s investigation into the reported theft, the Department contacted Ms. Canter who informed the Department that she had been contacted by Mr. Rivas on December 19, 2017, after which she went to her unit and confirmed that numerous items had been stolen from her storage unit.

4. On December 26, 2017, the Department met again with Edward Rivas who reviewed camera footage with the Department. During this investigation, Mr. Rivas explained that on December 18, 2017, at approximately 9:30 p.m., an individual named Catherine Rostow used her access code to enter Extra Space Storage where she had a unit. Ms. Rostow was accompanied by Plaintiff, as well as an unidentified male and a young girl. Mr. Rivas related to me, which I then confirmed by viewing the video myself, the following: Plaintiff’s unidentified male companion removes bolt cutters from his bag pack and then cuts the lock on the unit adjacent to Plaintiff’s unit, which was identified as Ms. Canter’s unit. Rostow and Plaintiff then took items from Ms. Canter’s unit and transferred them to Plaintiff’s unit. Based on Ms. Canter’s and Mr. Rivas’ statements to the Department, as well as the video footage, I formed the opinion that there was

1 probable cause to believe that Plaintiff was in violation of Penal Code section 459 –
2 Burglary.

3 5. Based on the evidence available to the Department at the time, I requested a
4 search warrant on December 28, 2017, which was read and signed by the Honorable
5 Beverly Bourne of the Los Angeles Superior Court. (A true and correct copy of the
6 signed search warrant and affidavit in support thereof is submitted herewith as Exhibit 1.)

7 6. That same day, I, along with members of the Department's Burglary/Auto-
8 Theft Detail, went to Extra Space Storage to execute the search warrant. Mr. Rivas
9 opened Units B106 and B107 which was a sub-unit of Unit B106. Ms. Canter was also
10 present at the scene and identified several items in Plaintiff's unit that belonged to her,
11 including: (1) One black gym bag containing miscellaneous clothing; (2) One blue
12 shopping bag; (3) One black tote bag; (4) One black circular bag; (5) One red jacket; (6)
13 Two pairs of shoes; (7) One sprint bag with miscellaneous items. Prior to the search, Ms.
14 Canter had provided me with photographs of the recovered items which further supported
15 my belief that such items were stolen. Pursuant to the warrant, we seized and
16 photographed the stolen items and returned them to Ms. Canter.

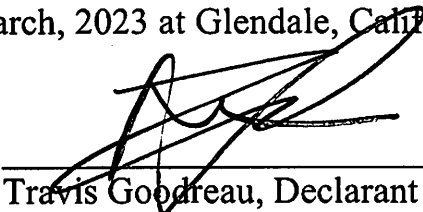
17 7. Thereafter, on January 5, 2018, the Department received a call for a burglary
18 in progress. Specifically, the reporting party stated that a male and female were loading
19 up a U-Haul truck with possible stolen items. Once on the scene, the Department
20 positively identified Plaintiff and arrested her pursuant to Penal Code section 459 based
21 on our investigation detailed above.

22 8. After another responding officer had placed Plaintiff under arrest, I read
23 Plaintiff her Miranda Rights and interviewed her during which I informed her of the
24 circumstances of our investigation, including that we had executed a search warrant and
25 had located stolen items in her storage unit. Plaintiff denied having stolen any property.
26 After our interview, we located additional stolen items belonging to Ms. Canter in
27 Plaintiff's vehicle, which we returned to Ms. Canter. The additional discovery of stolen
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1 items in Plaintiff's possession confirmed that to us that Plaintiff's statement that she had
2 not stolen any items was demonstratively false.

3 I declare under penalty of perjury under the laws of the State of California and the
4 United States of America that the foregoing is true and correct.

5 Executed this 14TH day of March, 2023 at Glendale, California.

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Travis Goodreau, Declarant